

ADMITTED IN:
NEW YORK
CONNECTICUT



WWW.STRACHERLAW.COM

August 9, 2023

BY ECF

The Honorable May Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

**Re: *The Satanic Temple, Inc. v. Newsweek Digital, LLC* (22-cv-1343)
 Joint Request for Extension of Discovery Deadline**

Dear Judge Vyskocil:

Pursuant to Individual Civil Rule 2(G), Plaintiff The Satanic Temple, Inc. (“The Satanic Temple”) and Defendant Newsweek Digital, LLC (“Newsweek”) jointly request a sixty (60) day extension of the deadline to complete fact discovery to November 7, 2023. The current deadline is September 8, 2023. (ECF 34). This is the first extension requested by either party.

To date, the Parties have worked expeditiously to comply with the current discovery deadline. They have served and responded to written discovery, substantially completed exchange of their respective document productions, and met and conferred regarding party and third-party depositions. However, the Parties have reached a disagreement regarding the scope of discovery as outlined in their Joint Discovery Letter, filed on August 2, 2023. (ECF 39). That matter is currently before Magistrate Judge Sarah Cave and has been scheduled for hearing on August 28, 2023. (ECF 41). Relatedly, the Parties have been unable to reach an agreement regarding the scope of questioning during certain third-party depositions, and will promptly be filing a joint discovery letter requesting the Court’s assistance in resolving that dispute.

Given these outstanding questions regarding the scope of discovery, which will not be resolved before August 28th at the earliest, the Parties respectfully request this extension of the fact discovery deadline in order to provide sufficient time to schedule and prepare for depositions in accordance with the Court’s ruling on the discovery disputes.

Respectfully submitted,

CROWN LAW

/s/ Matt Kezhaya

Matt Kezhaya
150 S. Fifth Street, Suite 1850
Minneapolis, MN 55402
Tel: (479) 431-6112
matt@crown.law

REISS SHEPPE LLP

Matthew Sheppe
425 Madison Ave., 19th Floor
New York, NY 10017
Tel: (212) 753-2424
Fax: (347) 348-0731
msheppe@reissheppe.com

Attorneys for Plaintiff

CAMERON STRACHER, PLLC

/s/ Cameron Stracher

Cameron Stracher
Sara C. Tesoriero
51 Astor Place, 9th Floor
New York, NY 10003
Tel: (646) 992.3850
Fax: (646) 992.4241
cam@stracherlaw.com
sara@stracherlaw.com

Attorneys for Newsweek Magazine, LLC